

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA**

EARL GAVIN,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. : 7:18-cv-00523-DCC-JDA
EXPERIAN INFORMATION SOLUTIONS)	
INC., et al.)	
)	
Defendants.)	

**DEFENDANT EQUIFAX INC.'S
RESPONSES TO LOCAL RULE 26.01 INTERROGATORIES**

Defendant, Equifax Inc. by and through its counsel, files its responses to Local Civil Rule 26.01 DSC Interrogatories as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Response: There are none known to Equifax Inc. at this time.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Response: The Plaintiff has requested a jury trial.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Response: Equifax Inc. is publicly traded company on the NYSE. It has no parent corporation or other corporation owning more than 10% of its stock.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Response: Equifax Inc. does not challenge the appropriateness of the Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

Response: Equifax Inc. is not aware of the relationship of this matter to any other matter currently filed in this District.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Response: Without waiving any defenses or conceding any liability, Defendant Equifax Inc. has been properly identified in the style of this case. Equifax Inc. is not a consumer reporting agency as set forth in the Motion to Dismiss being filed simultaneously herewith. Equifax Information Services LLC is a consumer reporting agency, but as set forth in the Motion to Dismiss, any amendment to the currently pending complaint would be futile.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Response: At this time, Equifax Inc. is not aware of any other persons or entities that may be liable to it in this matter.

Respectfully submitted this 26th day of March, 2018.

/s/ Rita Bolt Barker
Rita Bolt Barker (D.S.C. I.D. No. 10566)
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Attorneys for Defendant Equifax Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing by
CM/ECF, which will send notification to the following counsel of record:

Lyndey Ritz Zwingelberg
Adams and Reese
1501 Main Street
Fifth Floor
Columbia, SC 29201

Wilbur Eugene Johnson
Young Clement Rivers
PO Box 993
Charleston, SC 29402

And via U.S. Mail to:

Earl Gavin
300 Marion Avenue
Gaffney, SC 29341

Dated: March 23, 2018.

/s/ Rita Bolt Barker